

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :  
JOSEPH F. STAUDENMEIER : NO. 19-17004 amc  
STACEY A. STAUDENMEIER :  
Debtors :  
: CHAPTER 13

**MOTION OF DEBTORS, JOSEPH F. STAUDENMEIER AND STACEY A. STAUDENMEIER,  
TO REOPEN CASE**

Debtors, Joseph F. Staudenmeier and Stacey A. Staudenmeier, by and through their undersigned counsel, Jeffrey C. McCullough, Esquire, moves this Court to enter an Order reopening this case and in support thereof, state the following:

1. Debtors commenced this case by filing a Petition under Chapter 13 of the United States Bankruptcy Code under the above case number on November 7, 2019.
2. An Order Confirming Chapter 13 Plan was entered on April 8, 2020. The confirmed Plan provided for payments of arrearages on the primary mortgage loan secured by Debtors' residence as well as a pro rata distribution on unsecured nonpriority claims.
3. Debtors completed all required plan payments and the Chapter 13 Trustee filed a Notice with the Court that he had determined that all plan payments are completed on April 25, 2024.
4. On April 26, 2024, an Order was entered that the Debtor is required to file a statement regarding completion of an instructional course concerning financial management and a certification regarding domestic support obligations.
5. On May 2, 2024, Debtors' Certifications regarding Domestic Support Obligations and Section 522(q) were filed with the Court.
6. On July 9, 2024, the Trustee filed his Final Report.
7. On August 9, 2024, an Order approving the Final Report, discharging the Trustee and closing the case without the entry of an Order of Discharge and Notice thereof was entered.
8. The case was closed without an Order of Discharge due only to the failure of Debtors to file a statement regarding completion of an instructional course concerning financial management.

9. Debtors had intended to complete the required financial management course right after submitting the Certifications regarding Domestic Support Obligations and Section 522(q), but lost track of that obligation due to a family crisis involving their daughter.

10. On August 19, 2024, Debtors both completed the required course on personal financial management evidenced by the Certificates of Debtor Education attached hereto. Also attached hereto are copies of Certifications About a Financial Management Course signed by Debtors which they are prepared to file if this case is reopened.

11. After making substantial efforts over five years to successfully complete their obligations under the confirmed Chapter 13 Plan, the closure of this case without the entry of an Order of Discharge has negatively impacted Debtors' goal of a financial fresh start.

12. Debtors' failure to timely complete the Financial Management Course and submit Certifications of Completion has caused no prejudice to any creditor or party in interest.

13. Reopening this case to permit Debtors to file the Certificates of Debtor Education and Certifications of completion of the course and enable the entry of Order of Discharge will serve the interests of justice.

WHEREFORE, Debtors request that this Honorable Court enter an Order reopening this case to permit Debtors to file Certificates of Debtor Education and Certifications About a Financial Management Course and, if deemed appropriate by the Court thereafter, to enter an Order of Discharge.

Respectfully submitted,

Date: August 23, 2024

/s/Jeffrey C. McCullough  
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